

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

SEALED INDICTMENT

- v. -

14 CRIM 326

SOHAIL KASKAR and  
ABDUL HAMEED CHISHTI,  
a/k/a "Benny,"

Defendants.

SDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#  
DATE FILED: MAY 20 2014

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2013 through the present, in Spain, the United Arab Emirates, the Netherlands, and elsewhere, SOHAIL KASKAR and ABDUL HAMEED CHISHTI, a/k/a "Benny," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that SOHAIL KASKAR and ABDUL HAMEED CHISHTI, a/k/a "Benny," the defendants, would and did import into the United States from a place outside thereof one kilogram and more of a mixture and substance containing a detectable amount of heroin, in violation of Sections 812, 952(a), 960(a)(1), and 960(b)(1)(A) of Title 21, United States Code.

JUDGE OETKEN

3. It was further a part and an object of the conspiracy that SOHAIL KASKAR and ABDUL HAMEED CHISHTI, a/k/a "Benny," the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, one kilogram and more of a mixture and substance containing a detectable amount of heroin, intending and knowing that such substance would be imported into the United States from a place outside thereof, and into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 812, 959(a), 960(a)(3) and 960(b)(1)(A) of Title 21, United States Code.

**Overt Acts**

4. In furtherance of the conspiracy, and to effect the illegal objects thereof, SOHAIL KASKAR and ABDUL HAMEED CHISHTI, a/k/a "Benny," the defendants, and others known and unknown committed the following overt acts, among others:

a. On or about April 23, 2014, CHISHTI attended a meeting in Barcelona, Spain, where he and others discussed, among other things, the transportation of heroin from Pakistan to the United States.

b. On or about April 24, 2014, CHISHTI attended a meeting in Barcelona, Spain, where he and others discussed, among other things, the transportation of heroin from Pakistan to the United States.

c. On or about April 28, 2014, KASHKAR attended a meeting in Dubai, United Arab Emirates, where he and others discussed, among other things, the transportation of heroin from Pakistan to the United States.

d. On or about May 16, 2014, KASKAR participated in a telephone discussion about, among other things, the delivery of a sample of heroin to Amsterdam as a prelude to a future heroin shipment to the United States.

e. On or about May 17, 2014, CHISHTI participated in electronic communications about, among other things, his traveling to Amsterdam in connection with the delivery of a one-kilogram sample of heroin.

(Title 21, United States Code, Sections 812, 952, 959, 960 and 963; and Title 18, United States Code, Section 3238.)

**FORFEITURE ALLEGATION**

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, SOHAIL KASKAR and ABDUL HAMEED CHISHTI, a/k/a "Benny," shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner

or part to commit and to facilitate the commission of the offenses alleged in Count One of this Indictment.

**Substitute Asset Provision**

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code;  
Sections 853 and 970.)

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*[Signature]*  
FOREPERSON

*[Signature]*  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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21 U.S.C. §§ 952, 959, 960, 963

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PREET BHARARA  
United States Attorney.



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Foreperson